

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

James E. Shelton, individually and on behalf of
all others similarly situated,

Plaintiff,

VS.

Pro Source Lending Group LLC, d/b/a Fast Fund Group, d/b/a Fast Funds Group, and Brittany Wilson

Defendants.

Case No. 2:24-cv-04394-GAM

JOINT STIPULATION TO EXTEND TIME TO RESPOND TO MOTION TO DISMISS

Plaintiff, James E. Shelton (“Plaintiff”), and Defendant, Pro Source Lending Group LLC, d/b/a Fast Fund Group, d/b/a Fast Funds Group (“Defendant”), by and through their undersigned counsel, hereby stipulate and agree that Plaintiff shall have until February 5, 2025, to answer, plead, or otherwise respond to Defendant’s *Motion to Dismiss*, ECF No. 17, effective upon approval by this Court. This is the first stipulation extending the time to respond to Defendant’s *Motion to Dismiss*. Counsel for Plaintiff has also obtained the approval of counsel for Defendant Brittany Wilson, who is not opposed to the requested relief.

Respectfully submitted,

/s/ Andrew Roman Perrong
Andrew Roman Perrong
PERRONG LAW LLC
2657 Mount Carmel Avenue
Glenside, PA 19038
(215) 225-5529
Attorneys for Plaintiff

/s/ Jeffrey N. Rosenthal
Jeffrey N. Rosenthal
BLANK ROME LLP
130 North 18th Street
Philadelphia, PA 19103
(215) 569-5553
Attorneys for Defendant Pro Source

Dated: January 20, 2025

Dated: January 20, 2025

/s/ Lance Rogers

Lance Rogers, Esquire

Rogers Counsel

26 E Athens Ave

Ardmore, PA 19003

lance@rogerscounsel.com

(610) 557 -0493

(877) 649-1880 (fax)

Lance@RogersCounsel.com

Attorney for Defendant Brittany Wilson

Dated: January 20, 2025

APPROVED BY THE COURT:

/s/ Gerald Austin McHugh

The Honorable Gerald A. McHugh, U.S.D.J.

Dated: January 21, 2025